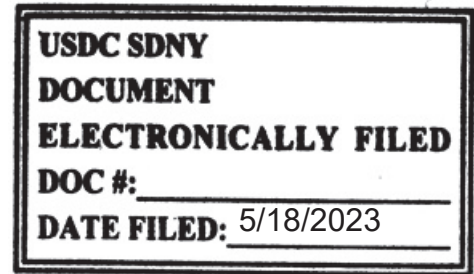


OSBORN LAW P.C.

Daniel A. Osborn, Esq.
Lindsay M. Trust, Esq.

dosborn@osbornlawpc.com
ltrust@osbornlawpc.com

May 18, 2023



VIA ECF

Honorable Robert W. Lehrburger
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007-1312

Re: *Krell v. Commissioner of Social Security*
Civil Action No. 1:22-cv-10264-RWL

Dear Judge Lehrburger,

We write on behalf of our client, Steven Michael Krell, to request additional time to file his motion for judgment on the pleadings which is currently due on May 22, 2023 per the Court's January 24, 2023 Order Granting Extension of Time. This is the second request for an extension of time. Plaintiff requests this extension because we have just filed our Notices of Appearance in this case on May 4, 2023, the Letter Motion to Substitute Attorney was granted on May 12, 2023, and we need additional time to review the case file and the Administrative Transcript.

Defendant would like an additional 14 days from August 21, 2023, if needed, to file its Cross-motion as Attorney Hanna is out of town and her associate cannot confirm an exact date to respond. The Defendant will notify the Court by May 26, 2023, if such an extension is necessary.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file his motion for judgment on the pleadings on or before: **June 21, 2023;**
- Defendant to file its response to plaintiff's motion/cross motion on or before: **August**

Honorable Robert W. Lehrburger

May 18, 2023

Page Two

21, 2023 (Defendant like an option to extend this by 14 days if needed); and

- Plaintiff to file his reply, if any, **14 days** after filing of the Defense Cross-Motion.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn

Daniel A. Osborn

OSBORN LAW, P.C.

43 West 43rd Street, Suite 131

New York, New York 10036


Telephone: 212-725-9800

Facsimile: 212-500-5115

dosborn@osbornlawpc.com

cc: Jessamyn Hanna, Esq. (by ECF)

SO ORDERED:

5/18/2023 

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE